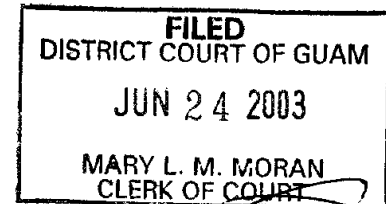


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MALLETIER, CHANEL, INC. and
PRADA, S.A.



UNITED STATES DISTRICT COURT OF GUAM

LOUIS VUITTON MALLETIER and
CHANEL, INC., and PRADA, S.A.

Plaintiffs,

vs.

HANA TRADE CORPORATION dba
HONOLULU GIFT SHOP aka U.S.A. T-
SHIRTS AND GIFT ITEMS, VENDOR
DOE II aka SU KIM, VENDOR DOE
III, KIM CHOL KUN dba ANGELUS,
VENDOR DOE IV aka LISA'S,
VENDOR DOE V aka FASHION CITY,
VENDOR DOE VI aka CORALYN'S
VARIETIES, VENDOR DOE VII and
DOES I THROUGH XX,

Defendants.

CIVIL CASE NO. 03-00013

**PLAINTIFFS' SECOND EX PARTE
APPLICATION FOR TEMPORARY
RESTRAINING ORDER, SEIZURE
ORDER, ORDER TO SHOW CAUSE FOR
PRELIMINARY INJUNCTION, AND
ORDER ACCELERATING DISCOVERY**

Plaintiffs Louis Vuitton Malletier, Chanel Inc. and Prada S.A. ("Plaintiffs") move this Court, pursuant to 15 U.S.C. §1116, Rules 30, 34 and 65 of the Federal Rules of Civil Procedure, and L.R. 7.1(j) and request an expedited ex parte hearing therefor, for an order (1) temporarily restraining defendants and all those acting in concert and/or participation with them, from selling, distributing, offering for sale or using in any manner or disposing of items bearing Plaintiffs' trade names or

trademarks or any of Plaintiffs' registered trademarks and logos, or any imitations or copies thereof, during the pendency of this action; (2) directing the seizure and impoundment of items in defendants' possession, custody or control which infringe Plaintiffs' trade names or trademarks and/or logos, which are used to manufacture infringing trademarks and/or logos and, which are used to manufacture infringing merchandise; (3) to show cause why a preliminary injunction should not be issue; (4) sealing the Court file until the hearing on the Court's order to show cause why a preliminary injunction should not issue in this case, and (5) for accelerated discovery.

This application is made pursuant to the Trademark Counterfeiting Act of 1984 (15 U.S.C. § 1116(d)), Rules 34, 64 and 65 of the Federal Rules of Civil Procedure, and L.R. 7.1(j). This application is based on the grounds that (i) defendants' acts of trademark infringement and unfair competition are causing irreparable injury to Plaintiffs and are in violation of the Lanham Act, 15 U.S.C. § 1051 et seq., and the common law, and (ii) giving advance notice of this application to defendants or the failure to impound temporarily the infringing merchandise will cause irreparable injury and frustrate the relief Plaintiffs seek in this action. Plaintiffs are prepared to post \$2,500.00 as a security bond for issuance of the temporary restraining and seizure order.

This application is based on the Verified First Amended Complaint, the accompanying memorandum of points and authorities, and the Declarations of Rosa Resendez, Hyon Junk Kim, Regina Terlaje, Karla Kehres, and Anita P. Arriola, and exhibits attached thereto, such matters of which this Court may take judicial notice and such evidence and argument as may be presented at the hearing.

Dated this 23rd day of June, 2003.

ARRIOLA, COWAN & ARRIOLA
Counsel for Plaintiffs LOUIS VUITTON
MALLETIER, CHANEL INC. AND PRADA S.A.

BY: 
ANITA P. ARRIOLA